

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 9:22-cv-81684-JIC

IONA LEWIS and JACLYN HEERY,
individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

HOMESPIRE MORTGAGE
CORPORATION, a Maryland corporation,

Defendant.

_____ /

PLAINTIFFS' SUPPLEMENTAL STATEMENT OF CLAIM

Plaintiffs, by and through undersigned counsel, hereby file their Statement of Claim, as follows:¹

All Plaintiffs seek the statutory minimum wages due them, “free and clear,” along with liquidated damages, reasonable attorneys' fees, and costs of suit, and for all other relief the Court deems just and proper, including a declaration Defendant’s Pay Policy violates the FLSA and injunctive relief prohibiting Defendant from maintaining the Pay Policy going forward. The statutory minimum wages due Plaintiffs is based on a minimum of forty (40) hours worked by Plaintiffs, per workweek, during the first three (3) months of their respective employment.

All Plaintiffs also seek overtime compensation.

Plaintiff, Lewis, also seeks additional unpaid minimum wages for the last pay period of her employment (\$522.00), liquidated damages in that same amount (\$522.00), along with unpaid

¹ Plaintiffs will file amended statements of claim at appropriate intervals based on the timing of any consents to join filed by additional similarly situated individuals, or as this Court orders otherwise.

commissions for her entire tenure. Lewis will amend this statement once Homespire produces relevant documentation relating to the commissions owed. Otherwise, the following table summarizes the estimated/approximated claims of all Plaintiffs thus far:

Name	Dates of Employment	Weekly Hours Worked	Hourly Rate of Pay	Minimum Wages Owed At Federal Rate	OT Comp Owed
Iona Lewis ²	4/18/22 – 8/25/22	45	\$15.00	\$3,480.00	\$2,025.00
Jaclyn Heery ³	3/7/22 – 10/14/22	50	\$15.00	\$3,480.00	\$6,975.00
Brian Smith ⁴	3/2022 – 10/2022	50	\$15.00	\$3,480.00	\$6,975.00
Michele Garcia ⁵	1/28/22 – 10/12/22	60	\$15.00	\$3,480.00	\$18,000.00
Chris Ivester ⁶	3/22/22 – 10/14/22	47.5	\$15.00	\$3,480.00	\$5,231.25
Anthony Hernandez ⁷	1/3/22 – 8/25/22	57.5	\$15.00	\$3,480.00	\$14,568.75
William Bulloch ⁸	2/28/22 – 10/14/22	60	\$15.00	\$3,480.00	\$14,400.00
Savannah Pringle ⁹	4/22 – 8/22	47.5	\$15.00	\$3,480.00	\$3,037.50
Elizabeth Oviedo ¹⁰	7/15/22 – 11/15/22	45	\$15.00	\$3,480.00	\$1,912.50
Terry O'Neill ¹¹	5/2/22 – 10/15/22	42.5	\$15.00	\$3,480.00	\$1,293.75
Tiffany Hightower ¹²	2/22 – 7/22	60	\$15.00	\$3,480.00	\$9,675.00

² Homespire located Lewis in one its Boca Raton, Florida branch.

³ Homespire located Heery in its Roswell, Georgia branch.

⁴ Homespire located Smith in its Roswell, Georgia branch.

⁵ Homespire located Garcia in its Orlando, Florida branch.

⁶ Homespire located Ivester in its Roswell, Georgia branch.

⁷ Homespire located Hernandez in its Miami, Florida branch.

⁸ Homespire located Bulloch in its Roswell, Georgia branch.

⁹ Homespire located Pringle in its Roswell, Georgia branch.

¹⁰ Homespire located Oviedo in its Providence, Rhode Island branch.

¹¹ Homespire located O'Neill in its Kansas City, Missouri branch.

¹² Homespire located Hightower in its Oklahoma City, Oklahoma branch.

Name	Total Wages Owed	Liquidated Damages	Total Damages
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Iona Lewis	\$5,505.00	\$5,505.00	\$11,010.00
Jaclyn Heery	\$10,455.00	\$10,455.00	\$20,910.00
Brian Smith	\$10,455.00	\$10,455.00	\$20,910.00
Michele Garcia	\$21,480.00	\$21,480.00	\$42,960.00
Chris Ivester	\$8,711.25	\$8,711.25	\$17,422.50
Anthony Hernandez	\$18,048.75	\$18,048.75	\$36,097.50
William Bulloch	\$17,880.00	\$17,880.00	\$35,760.00
Savannah Pringle	\$6,517.50	\$6,517.50	\$13,035.00
Elizabeth Oviedo	\$5,392.50	\$5,392.50	\$10,784.00
Terry O'Neill	\$4,773.75	\$4,773.75	\$9,547.50
Tiffany Hightower	\$13,155.00	\$13,155.00	\$26,310.00

* All dates and hours are estimated/approximated, subject to amendment based on production of Defendant's wage and hour records.

+ Overtime calculations subject to amendment based on production of Defendant's commission payment records.

Dated: February 10, 2023
Boca Raton, FL

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